

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

D.J.C.V., minor child, and G.C., his  
father,

Plaintiffs,

v.

United States of America,

Defendant.

No. 1:20-cv-5747

***AMICI CURIAE* SIXTEEN ORGANIZATIONS ADVOCATING FOR  
ASYLUM SEEKERS NOTICE OF SUPPLEMENTAL  
AUTHORITY IN SUPPORT OF THEIR AMICUS BRIEF**

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 1, 2021, this document was filed through the Court's Electronic Case Filing (ECF) system and thus copies will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Harrison J. Frahn IV

Harrison J. Frahn IV

*Amici Curiae* Bet Tzedek; Bronx Defenders; Catholic Charities Community Services, Archdiocese of New York Division of Immigrant and Refugee Services; Catholic Migration Services, Inc.; City Bar Justice Center; The Door; Her Justice; HIAS Pennsylvania; Immigration Justice Corps; Immigration Legal Resources Center; International Refugee Assistance Project, Inc.; LatinoJustice PRLDEF; The Legal Project; The Public Law Center; Safe Passage Project; and UnLocal Inc. (the “*Amici*”) respectfully submit U.S. Dep’t. of Justice, Office of the Inspector General, 21-028, *Review of the Department of Justice’s Planning and Implementation of Its Zero Tolerance Policy and Its Coordination with the Departments of Homeland Security and Health and Human Services* (2021) (attached as **Exhibit A**) in support of their Amicus Brief in support of the Plaintiffs’ Response to the Motion to Dismiss.

The Office of the Inspector General (“OIG”) released the report attached as Exhibit A on January 14, 2021. In brief, the internal Report establishes the development of a high-level policy of zero tolerance, and that the Office of the Attorney General (“OAG”) had “primary responsibility” for the development of the zero tolerance policy and was the “driving force” in the DHS decision to begin referring family unit adults for prosecution, despite knowing that this would result in children being separated from families. Ex. A, at 69.

The *Amici* believe that the internal report published by the Department of

Justice will be helpful to the resolution of the underlying case and submits it as additional authority for the consideration of the Court.

Dated: February 1, 2021

Respectfully submitted,

By: /s/ Harrison J. Frahn IV

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